

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**STATE OF OKLAHOMA, *et al.*** )

*Plaintiffs,* )

**v.** )

**Case No. 4:05-cv-00329-GKF-SAJ**

**TYSON FOODS, INC., *et al.*** )

*Defendants.* )

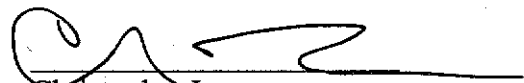
**Declaration of Christopher Lucas**

I, Christopher Lucas, state the following:

1. My name is Christopher Lucas. I am currently employed as the Litigation Support Manager for Sidley Austin LLP, Washington, D.C.
2. I earned a J.D. from the University of Virginia in 1993. I also received a Masters of Business Administration from the University of Maryland, University College, in 2007, and a B.A. from Virginia Polytechnic Institute and State University in 1990. In addition, I have successfully completed college level course work in both computer programming and network administration.
3. I have approximately fourteen years of experience in litigation support. For six years, I conducted litigation support for the Department of Justice on behalf of CACI, Inc. I have also served for six years as Litigation Support Manager for Arent Fox LLP, Washington D.C., and for two years in my current position as Litigation Support Manager for Sidley Austin LLP, Washington, D.C. In my various employments, I have repeatedly encountered instances requiring the production of complex programs and data sets.
4. I have been asked by Mr. Jay T. Jorgensen of Sidley Austin LLP, counsel for the Tyson Defendants in this matter, to offer my opinion as to the common and best available practice related to the production of complex computer programs and data sets.
5. Based on my experience, the common and best available practice related to the production of complex computer programs and data sets consists of creating and producing a mirror copy of the complete, unaltered program data as it appeared in its original computer environment. This is easily and affordably accomplished through the use of any one of a number of readily available programs such as Norton's Ghost, Guidance Software's Encase, or AccessData's Forensic Tool Kit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 4, 2008

  
Christopher Lucas

Washington, District of Columbia

On this 11th day of June, 2008

Christopher Lucas

personally appeared before me and acknowledged that  
he/she executed the foregoing instrument.

Lafene Watson Johnson Notary Public

My Commission Expires May 14, 2012